



Curtis L. Groves
Senior Attorney
Public Policy
New York/New England Region

1133 19th Street NW
Washington, DC 20036
202 736 6160
Fax 202 736 6242
Curtis.Groves@wcom.com

August 16, 2002

VIA EMAIL AND OVERNIGHT COURIER

Ms. Mary Cottrell
Secretary
Massachusetts Department of Telecommunications and Energy
One South Station, 2nd Floor
Boston, Massachusetts 02110

Re: Docket 01-33: MCI WorldCom Communications, Inc,
Request for a Growth Code in 857 NPA, Boston Rate
Center, to Meet a Specific Customer Need

Dear Ms. Cottrell:

On July 29, 2002, the Department requested comments on MCI WorldCom Communications, Inc.'s ("WorldCom") Request for a Growth Code. No party filed initial comments. WorldCom hereby submits this letter in lieu of reply comments to respond to the specific questions raised in the Department's Request for Comments

WorldCom has requested a growth code because its customer, the Federal Reserve Bank of Boston ("Bank" or "Customer"), is undertaking a nationwide initiative to ensure its telecommunications services have redundancy and that contingency plans are in place in case of an emergency. The Bank requires seven-digit numbers in the 857 overlay code that are identical to the numbers currently assigned to its personnel and equipment in the 617 NPA in order to implement its plans. It is the Bank's goal to establish network redundancy in each of its branches nationwide, including the Boston branch, by acquiring new telephone numbers that are as similar as possible to its existing numbers. Because the telephone numbers in the 857-973 NPA/NXX will be served via WorldCom's facilities-based network, and because the Bank's current telephone numbers in the 617-973 NPA/NXX are served via another's carrier's network facilities, assignment of the requested numbers will achieve the network redundancy that the Bank is seeking. The Bank is implementing this initiative in response to the September 11, 2001 terrorist attacks, the effect of which was that the New York City branch's DID network was disabled and callers were unable to reach the Bank. The Bank has already implemented its network emergency initiative in its New York City, Dallas and San Francisco branches, and plans to expand the initiative to all of twelve of its branches throughout the country.

The July 29 Request for Comments asks: (1) whether the Bank's plan is the only way of achieving the desired redundancy; (2) if it is not the only way, is it the best way; and (3) whether number porting would provide an effective alternative.

At the heart of the Bank's plan is the Bank's desire to minimize the variables that callers would have to consider when trying to reach the Bank in an emergency. In an emergency, the Bank wants its callers to be able to reach it simply by changing the area code, thereby minimizing the amount of thought and effort that must be expended by callers seeking to get through to the Bank in the event of catastrophe. For example, if a particular telephone number at the bank is 617-973-1234, the Bank's plan allows for callers to reach that same location by changing only the area code, i.e. by dialing 857-973-1234. The redundancy accomplished by the Bank's plan will likewise permit outward dialing in the event that either of the two networks suffer a service affecting outage.

There is no other practical way of accomplishing the Bank's goal. WorldCom does not have the numbering resources, for example, to serve the Bank's needs via an existing code in the 617 NPA (thereby changing only the NXX code). To meet the Bank's redundancy needs via its existing number inventory, WorldCom would have to assign the Bank numbers from several different NXX codes in the 617 NPA, thereby defeating the Bank's goal of minimizing dialing variables in an emergency. Indeed, not only would the simplicity inherent in the Bank's plan be frustrated by such a patchwork solution, the net result would be that it would be *more* difficult for callers (e.g. government agencies and financial institutions) to reach the Bank because there would be such a mix of different NXX codes, quite likely split between the 617 and 857 NPAs. For similar reasons, number porting cannot support the Bank's needs, as uncontaminated blocks beginning with 2, 3, 4, 5 and 9 would have to be ported to WorldCom and would again produce a crazy quilt of different NPAs and NXXs, defeating the Bank's goal of simplified emergency dialing.

Therefore, in response to the Department's questions, the only way to implement the Bank's dual goals of network redundancy and ease-of-dialing in an emergency is via the Bank's nationwide initiative, as set forth in WorldCom's Request for Growth Code.

Finally, it is important to remember that this is not an ordinary customer, but rather the nation's central bank, among whose goals is to promote sound growth and financial stability in New England and the nation. The Bank's ability to function in an emergency, including callers' ability to reach the Bank, is clearly in the public's interest.

Mary Cottrell, Secretary
August 16, 2002
Page 3 of 3

Granting WorldCom's request will facilitate the ability of a branch of the central bank of the United States to implement its emergency preparedness contingency plans. For all of the above reasons and for the reasons discussed in WorldCom's July 12 Request and July 26 supplemental letter, WorldCom respectfully requests that the Department grant WorldCom's request on an expedited basis and direct the numbering administrator to assign immediately the 857-973 code to WorldCom.

If you have any additional questions regarding this request, please do not hesitate to contact me.

Respectfully submitted,

MCI WORLDCOM
COMMUNICATIONS, INC.



Curtis L. Groves

Copies: Michael Isenberg, Esq., Telecomms Dir.
Paula Foley, Esq., Hearing Officer
Ms. April Mulqueen, Asst. Dir, Telecomms

Christopher J. McDonald, Esq.

D.T.E. 01-33 Service List (by email)